

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

SHAUN WALKER,
[DOB: 09/18/1982],

Defendant.

Case No. _____

COUNT ONE:

**Attempted Distribution of Child
Pornography Over the Internet**

18 U.S.C. § 2252(a)(2)

NLT: 5 Years Imprisonment

NMT: 20 Years Imprisonment

NMT: \$250,000 Fine

Supervised Release: 5 Years to Life

Class C Felony

COUNT TWO:

**Receipt of Child Pornography Over the
Internet**

18 U.S.C. § 2252(a)(2)

NLT: 5 Years Imprisonment

NMT: 20 Years Imprisonment

NMT: \$250,000 Fine

Supervised Release: 5 Years to Life

Class C Felony

COUNT THREE:

Possession of Child Pornography

18 U.S.C. § 2252(a)(4)

NMT: 20 Years Imprisonment

NMT: \$250,000 Fine

Supervised Release: 5 Years to Life

Class C Felony

Forfeiture Allegation

\$100 Mandatory Special Assessment
(Each Count)

INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE

Between on or about May 18, 2021, and on or about May 28, 2021, said dates being approximate, in the Western District of Missouri and elsewhere, **SHAUN WALKER**, defendant,

using any means or facility of interstate or foreign commerce, knowingly attempted to distribute a visual depiction, separate and apart from the visual depictions relied upon in Counts Two, and Three, that had been shipped and transported in or affecting interstate and foreign commerce by any means including by computer, and the visual depiction contained material which had been shipped and transported in interstate and foreign commerce by any means including by computer; and the production of the visual depiction involved the use of a minor engaging in sexually explicit conduct, and such visual depiction was of such conduct, in violation of Title 18, United States Code, Section 2252(a)(2).

COUNT TWO

Between on or about May 19, 2021, and on or about July 9, 2021, said dates being approximate, in the Western District of Missouri and elsewhere, **SHAUN WALKER**, defendant, using any means or facility of interstate or foreign commerce, knowingly received a visual depiction, separate and apart from the visual depictions relied upon in Counts One, and Three, that had been shipped and transported in or affecting interstate and foreign commerce by any means including by computer, and the visual depiction contained material which had been shipped and transported in interstate and foreign commerce by any means including by computer; and the production of the visual depiction involved the use of a minor engaging in sexually explicit conduct, and such visual depiction was of such conduct, in violation of Title 18, United States Code, Section 2252(a)(2).

COUNT THREE

On or about November 29, 2021, the date being approximate, in the Western District of Missouri, **SHAUN WALKER**, defendant, knowingly possessed one or more films, videotapes, and other matter which contained visual depictions, separate and apart from the visual depictions

relied upon in Counts One, and Two, that had been shipped and transported in interstate and foreign commerce by any means including by computer, and which were produced using materials which had been shipped and transported in interstate and foreign commerce by any means including by computer; and the production of the visual depictions involved the use of minors engaging in sexually explicit conduct, and were visual depictions of such conduct, in violation of Title 18, United States Code, Section 2252(a)(4).

FORFEITURE ALLEGATION

The allegations contained in Counts One through Three are realleged and are incorporated by reference herein for the purpose of alleging forfeiture of: any visual depiction described in Title 18, United States Code, Section 2252, or any film, videotape, or other matter which contains any such visual depiction, which was transported, mailed, shipped, or received in violation of these sections; any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offenses; and any property, real or personal, used or intended to be used to commit or to promote the commission of such offenses; including, but not limited to the following:

1. One Samsung S9 cellphone, IMEI356417096309840.

All in violation of Title 18, United States Code, Section 2253.

A TRUE BILL.

/s/ Kathleen Shaw

FOREPERSON OF THE GRAND JURY

/s/ Catherine A. Connelly

Catherine A. Connelly
Assistant United States Attorney

Date: 4/5/2022
Kansas City, Missouri